

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO
RICO, *et al.*

Debtors.¹

PROMESA
Title III

Case No. 17 BK 3283-LTS

(Jointly Administered)

**SUPPLEMENTAL MOTION SUBMITTING VERIFIED STATEMENT OF DÍAZ &
VÁZQUEZ LAW FIRM P.S.C. PURSUANT TO 48 U.S.C. § 2178 AND BANKRUPTCY
RULE 2014(a) AS COUNSEL TO THE PUERTO RICO ELECTRIC POWER
AUTHORITY**

In accordance with the Puerto Rico Recovery Accuracy in Disclosures Act, Pub. L. No. 117-82, 48 U.S.C. § 2178(c) (“PRRADA”), and the Court’s related Order Approving List of Material Interested Parties Pursuant to the Puerto Rico Recovery Accuracy in Disclosure Act [Docket No. 20467] (the “Order”), the Díaz & Vázquez Law Firm, P.S.C., as counsel to the Puerto Rico Electric Power Authority (the “PREPA”), hereby submits this Supplemental Verified Statement pursuant to Rule 2014(a) of the Federal Rules of Bankruptcy Procedure.

¹ The Debtors in the jointly-administered Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Dated: May 27, 2022
In San Juan, Puerto Rico.

/s/ Katuska Bolaños Lugo
Katuska Bolaños Lugo
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CERTIFICATE OF SERVICE

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

/s/ Katuska Bolaños Lugo
Katuska Bolaños Lugo

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as representative of

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PROMESA
Title III

Case No. 17 BK 3283-LTS

(Jointly Administered)

**SUPPLEMENTAL VERIFIED STATEMENT OF DÍAZ & VÁZQUEZ LAW FIRM
P.S.C. PURSUANT TO 48 U.S.C. § 2178 AND BANKRUPTCY RULE 2014(a) AS
COUNSEL TO THE PUERTO RICO ELECTRIC POWER AUTHORITY**

I, Maraliz Vázquez Marrero, state the following under penalty of perjury:

1. I am a Member in the law firm of Díaz & Vázquez Law Firm, P.S.C. (“D&V” or the “Firm”), located at 290 Jesús T. Piñero Ave., Oriental Tower, Suite 803, San Juan, Puerto Rico. D&V is a mid-sized full-service law firm, with thirteen (13) attorneys providing legal services to both private and governmental clients in San Juan, Puerto Rico. I am a member in good standing of the bars of the Commonwealth of Puerto Rico and the United States District Court for the District of Puerto Rico.

² The Debtors in the jointly-administered Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No.17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. In accordance with the Puerto Rico Recovery Accuracy in Disclosures Act, Pub. L. No. 117-82, 48 U.S.C. § 2178(c) (“PRRADA”), and the Court’s related Order Approving List of Material Interested Parties Pursuant to the Puerto Rico Recovery Accuracy in Disclosure Act [Docket No. 20467] (the “Order”), D&V, as counsel to the Puerto Rico Electric Power Authority (the “PREPA”), hereby submits this Supplemental Verified Statement pursuant to Rule 2014(a) of the Federal Rules of Bankruptcy Procedure.

3. This Supplemental Verified Statement is intended to provide the disclosures required under PRRADA, the Order and Bankruptcy Rule 2014(a) and is a superseding amendment to the *Verified Statement of Díaz & Vázquez Law Firm P.S.C. Pursuant to 48 U.S.C § 2178 and Bankruptcy Rule 2014(a) as Counsel to the Puerto Rico Electric Power Authority* filed on May 19, 2022 (Doc. #20894). The undersigned has personal knowledge of the matters set forth herein. To the extent any information disclosed in this Verified Statement requires amendment or modification upon the Firm’s completion of further review, or as additional information becomes available, a supplemental Verified Statement will be submitted to the Court reflecting such amended or modified information.

4. In accordance with PRRADA, D&V conducted a check for conflicts of interest and other conflicts and connections. D&V maintains a database which includes the names of current and former clients and regularly conducts conflict checks analysis to identify conflicts of interest or other potential conflict issues. I caused D&V to review and analyze the conflicts database to determine whether D&V has any relationships with the material interested parties (“MIPs”) listed on the Amended List of Material Interested Parties Pursuant to Puerto Rico Recovery Accuracy in Disclosure Act [ECF No. 20458] (the “Amended MIP List”). D&V also requested information from all attorneys at D&V regarding MIPs in prior employments and whether the representation

of these MIPs in prior employments was related to PREPA or any other Debtor in the PROMESA cases.

5. To the extent that such searches indicated that D&V or any of its attorneys has or had a relationship with any MIPs, the identity of such entities, and D&V relationships therewith, are as follows:

(a) List of MIPs that D&V attorneys currently represent in matters wholly unrelated to the PROMESA cases and where D&V does not represent or has represented these MIPs in any matter concerning PREPA or the other Debtors, except as more fully specified and disclosed below:

1. Tax-Free Fixed Income Fund for Puerto Rico Residents, Inc.
2. Tax-Free Fixed Income Fund II for Puerto Rico Residents, Inc.
3. Tax-Free Fixed Income Fund III for Puerto Rico Residents, Inc.
4. Tax-Free Fixed Income Fund IV for Puerto Rico Residents, Inc.
5. Tax-Free Fixed Income Fund V for Puerto Rico Residents, Inc.
6. Puerto Rico Residents Tax-Free Fund, Inc.
7. Puerto Rico Residents Tax-Free Fund IV, Inc.
8. Puerto Rico Residents Tax-Free Fund VI, Inc.
9. Puerto Rico Aqueduct and Sewer Authority

(b) List of MIPs that D&V currently represents or is involved in advising in connection with the PROMESA cases:

1. Puerto Rico Electric Power Authority

(c) List of MIPs that D&V attorneys, in past employments, and during the last five (5) years, represented in matters wholly unrelated to the PROMESA cases, PREPA or any Debtor.

More specifically, attorney Irelis Rodríguez represented these MIPs:

1. Municipio de Ponce
2. Municipio de San Juan
3. Multinational Insurance Company
4. MAPFRE PRAICO Insurance Company
5. Caribbean Medical Center
6. Universidad de Puerto Rico

(d) List of MIPs that D&V attorneys, in past employments, and during the last five (5)

years, represented in connection with the ERS and COFINA PROMESA cases. More specifically, before joining D&V, attorney Maraliz Vázquez Marrero and attorney Arturo Díaz Angueira represented these MIPs in their roles as creditors of the ERS and COFINA. These MIPs have not been represented in any matter by D&V attorneys related to PREPA or other Debtors, aside from the disclosure made to above regarding the ERS and COFINA:

1. Puerto Rico AAA Portfolio Target Maturity Fund, Inc.
2. Puerto Rico AAA Portfolio Bond Fund, Inc.
3. Puerto Rico AAA Portfolio Bond Fund II, Inc.
4. Puerto Rico Fixed Income Fund, Inc.
5. Puerto Rico Fixed Income Fund II, Inc.
6. Puerto Rico Fixed Income Fund III, Inc.
7. Puerto Rico Fixed Income Fund IV, Inc.
8. Puerto Rico Fixed Income Fund V, Inc.
9. Puerto Rico Fixed Income Fund VI, Inc.
10. Puerto Rico GNMA and U.S. Government Target Maturity Fund, Inc.
11. Puerto Rico Investors Bond Fund I
12. Puerto Rico Investors Tax-Free Fund, Inc.
13. Puerto Rico Investors Tax-Free Fund II, Inc.
14. Puerto Rico Investors Tax-Free Fund III, Inc.
15. Puerto Rico Investors Tax-Free Fund IV, Inc.
16. Puerto Rico Investors Tax-Free Fund V, Inc.
17. Puerto Rico Investors Tax-Free Fund VI, Inc.
18. Puerto Rico Mortgage-Backed & U.S. Government Securities Fund, Inc.
19. Tax-Free Puerto Rico Target Maturity Fund, Inc.
20. Tax-Free Puerto Rico Fund II, Inc.
21. Tax-Free Puerto Rico Fund, Inc.
22. UBS IRA Select Growth & Income Puerto Rico Fund

6. Other than the disclosures made above, D&V does not represent and has not represented any of the MIPs in matters relating to PREPA or the other Debtors.

7. To the best of my knowledge, D&V does not represent and will not represent any entity, other than PREPA in matters related to these Title III cases. Furthermore, to the best of my knowledge, I believe that D&V (i) is a “disinterested person,” as that term is defined in section 101(14) of the Bankruptcy Code, relative to any entity or person on the Amended MIP List and (ii) does not represent or hold an adverse interest in connection with PREPA’s Title III case.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: May 27, 2022
In San Juan, Puerto Rico.

/s/ Maraliz Vázquez Marrero
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